



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Multi-drug Resistant Organism Repository and Surveillance Network (MRSN)
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US Army Medical Command - DHP Funded System

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- ☐ (1) Yes, from members of the general public.
- ☐ (2) Yes, from Federal personnel* and/or Federal contractors.
- ☒ (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- ☐ (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- ☒ **New DoD Information System** ☐ **New Electronic Collection**
- ☐ **Existing DoD Information System** ☐ **Existing Electronic Collection**
- ☐ **Significantly Modified DoD Information System**

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- ☐ **Yes, DITPR** Enter DITPR System Identification Number
- ☐ **Yes, SIPRNET** Enter SIPRNET Identification Number
- ☒ **No**

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- ☐ **Yes** ☒ **No**

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. Does this DoD information system or electronic collection require a Privacy Act System of Records Notice (SORN)?

A Privacy Act SORN is required if the information system or electronic collection contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

- ☒ **Yes** ☐ **No**

If "Yes," enter Privacy Act SORN Identifier

A0040-66b DASG

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office

Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an OMB Control Number?

Contact the Component Information Management Control Officer or DoD Clearance Officer for this information.

This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

☐ **Yes**

Enter OMB Control Number

Enter Expiration Date

☒ **No**

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) Cite the authority for this DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.)

(a) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect authority may be cited if the authority requires the operation or administration of a program, the execution of which will require the collection and maintenance of a system of records.

(c) DoD Components can use their general statutory grants of authority ("internal housekeeping") as the primary authority. The requirement, directive, or instruction implementing the statute within the DoD Component should be identified.

10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 1071-1085, Medical and Dental Care; 50 U.S.C. Supplement IV, Appendix 454, as amended, Persons liable for training and service; 42 U.S.C. Chapter 117, Sections 11131-11152, Reporting of Information; 10 U.S.C. 1097a and 1097b TRICARE Prime and TRICARE Program; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children; 10 U.S.C. 1079a, CHAMPUS; 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; E.O. 9397 (SSN); DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD Directive 6040.37, Confidentiality of Medical Quality Assurance (QA) Records; DoD 6010.8-R, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); and Army Regulation 40-66, Medical Record Administration and Health Care Documentation.

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The MRSN system serves as a central data repository of multi-drug resistant organism (MDRO) isolates, and their drug sensitivity, physical and genetic information. It is used to support medical treatment facility (MTF) quality assurance efforts; support assistance in the identification and management of disease outbreaks; provide guidance for effective and efficient medical treatment of MDRO related infections; and advance science related to the development and spread of drug resistance traits within these organisms. The MRSN program receives isolates and their related drug sensitivity data from Army MTFs, and records these isolates into the MRSN system, which creates bar-codes for them, and assigns a freezer location for storage and later retrieval. Staff for the MRSN run drug sensitivity and other tests on the received isolates, and these results are imported into the MRSN system.

The MRSN system stores the individual's name, birth date, social security number and gender, along with isolate laboratory test result data.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Privacy risks include unauthorized access to and or disclosure of PII and related medical information.

To address these risks the following steps will be taken:

1. The system will generate an internal MRSN Identifier for each isolate source (patient), which can only be mapped back to an individual through the MRSN system. Currently, the patient name is used .
2. PII data is not shared outside of this organization, except as described in item 2h below and with an appropriate memorandum of agreement in place for organizations outside of the US Army.
3. System PII data can only be accessed and displayed by users with the appropriate role-based permission.
4. The MRSN system and data will reside on production servers that are part of the Walter Reed Army Institute of Research (WRAIR) Local Area Network (LAN) and are installed in a secured server room. Currently, a stand-alone server is used.
5. Access to PII through the MRSN system is logged, including the date, time, user, and record accessed.
6. The database file will be encrypted.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

☒ **Within the DoD Component.**

Specify.

PII may be shared with the original source of the PII data (Army MTFs), and healthcare managers within the US Army Medical Command (MEDCOM).

☐ **Other DoD Components.**

Specify.

☐ **Other Federal Agencies.**

Specify.

☒ **State and Local Agencies.**

Specify.

PII may be shared with State and Local Public Health Departments as required by law.

☒ **Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

Various individual contractors perform work similar to other government staff assigned to this program. These contractors are required to complete the same Privacy Act/ Health Insurance and Portability Act training as their government counterparts. Specific clauses related to the protection of and non-disclosure of PII will be published in future contracts.

☐ **Other** (e.g., commercial providers, colleges).

Specify.

i. Do individuals have the opportunity to object to the collection of their PII?

☐ **Yes**

☒ **No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object.

The individual does not directly participate in the collection of PII for this system. The PII is collected at the MTF and provided to MRSN in a spreadsheet.

j. Do individuals have the opportunity to consent to the specific uses of their PII?

☐ **Yes**

☒ **No**

(1) If "Yes," describe the method by which individuals can give or withhold their consent.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

The individual does not directly participate in the collection of PII for this system. The PII is collected at the MTF and provided to MRSN in a spreadsheet.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

☐ **Privacy Act Statement**

☐ **Privacy Advisory**

☐ **Other**

☒ **None**

Describe each applicable format.

The individual does not directly participate in the collection of PII for this system. The PII is collected at the MTF and provided to MRSN in a spreadsheet.

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.

SECTION 3: PIA QUESTIONNAIRE and RISK REVIEW

a. For the questions in subparagraphs 3.a.(1) through 3.a.(5), indicate what PII (a data element alone or in combination that can uniquely identify an individual) will be collected and describe the source, collection method, purpose, and intended use of the PII.

(1) What PII will be collected? Indicate all individual PII or PII groupings that apply below.

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Other Names Used | <input checked="" type="checkbox"/> Social Security Number (SSN) |
| <input type="checkbox"/> Truncated SSN | <input type="checkbox"/> Driver's License | <input checked="" type="checkbox"/> Other ID Number |
| <input type="checkbox"/> Citizenship | <input type="checkbox"/> Legal Status | <input checked="" type="checkbox"/> Gender |
| <input type="checkbox"/> Race/Ethnicity | <input checked="" type="checkbox"/> Birth Date | <input type="checkbox"/> Place of Birth |
| <input type="checkbox"/> Personal Cell Telephone Number | <input type="checkbox"/> Home Telephone Number | <input type="checkbox"/> Personal Email Address |
| <input type="checkbox"/> Mailing/Home Address | <input type="checkbox"/> Religious Preference | <input type="checkbox"/> Security Clearance |
| <input type="checkbox"/> Mother's Maiden Name | <input type="checkbox"/> Mother's Middle Name | <input type="checkbox"/> Spouse Information |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Biometrics | <input type="checkbox"/> Child Information |
| <input type="checkbox"/> Financial Information | <input checked="" type="checkbox"/> Medical Information | <input type="checkbox"/> Disability Information |
| <input type="checkbox"/> Law Enforcement Information | <input type="checkbox"/> Employment Information | <input type="checkbox"/> Military Records |
| <input type="checkbox"/> Emergency Contact | <input type="checkbox"/> Education Information | <input type="checkbox"/> Other |

If "Other," specify or explain any PII grouping selected.

(2) What is the source for the PII collected (e.g., individual, existing DoD information systems, other Federal information systems or databases, commercial systems)?

The PII is collected at the MTF and provided to MRSN in a spreadsheet. PII data is manually entered into MRSN.